

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA**

David Keef,

Case No. 07-03915 (JMR/FLN)

Plaintiff,

v.

M.A. Mortenson Company,

Defendants.

**Mortenson's Motion for Expedited
Protective Order Prohibiting Plaintiff's
Counsel From Contacting Potential
Collective-Action Members Who Have
Not Opted Into This Action**

Defendant M.A. Mortenson Company hereby moves the Court under LR 83.6(d), Minn. R. Prof. Cond. 7.3(a), and the Court's inherent powers for an expedited protective order prohibiting plaintiff's counsel from initiating contact with potential collective-action members who have not voluntarily opted into this action, on the ground that such contact violates Rule 7.3(a) of the Minnesota Rules of Professional Conduct, which apply to this proceeding under LR 83.6(d). A more particular statement of the grounds for this motion and the reasons supporting expedited relief is set forth in Mortenson's Memorandum in Support of Motion for Protective Order, which is filed and served with this motion.

Dated: October 7, 2008

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